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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY
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June 8, 1995

VIA HAND DELIVERY

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
Room #222
1919 M Street, N.W.
Washington, D.C. 20554

**Re: In the Matter of Amendment to the Commission's Regulatory
Policies Governing Domestic Fixed Satellites and Separate
International Satellite Systems
IB Docket No. 95-41**

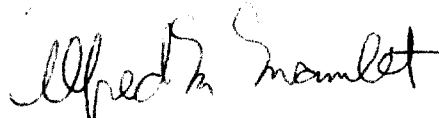
Dear Mr. Caton:

Enclosed please find for filing on behalf of Motorola Satellite
Communications Inc. an original and five copies of Motorola's Comments.

Also, enclosed please find one copy of the Motorola's Comments to be
date stamped and returned with our messenger.

If there are any questions concerning this filing, please do not hesitate to
contact me.

Respectfully submitted,



Alfred M. Mamlet
Counsel for Motorola Satellite
Communication, Inc.

/srh-m
Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Amendment to the Commission's
Regulatory Policies Governing
Domestic Fixed Satellites and
Separate International Satellite
Systems

IB Docket No. 95-41

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COMMENTS

Motorola Satellite Communications, Inc. ("Motorola") hereby comments on the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding. Motorola's comments are limited to one issue mentioned in a cursory fashion in the NPRM:

We also make no proposal at this time as to the extent to which Inmarsat should be permitted to serve the U.S. market, recognizing that we have not yet reached a coordination agreement ensuring sufficient spectrum for geostationary U.S. MSS licensee, American Mobile Satellite Corporation.^{1/}

Motorola believes that the Commission should not consider this issue in this proceeding for the following reasons.

^{1/} NPRM ¶ 39.

1. The NPRM does not provide a suitable vehicle for this issue because it devotes only one sentence to this important question. If the Commission would like to consider developing policies for Inmarsat service in the United States, then this should be done in the context of a complete consideration of the issues.

2. As the NPRM recognizes, no coordination agreement with Inmarsat has been reached.

3. There are substantial legal and policy issues inherent in any proposal to offer Inmarsat land mobile services in the United States raised by Motorola in Petition of Motorola Satellite Communications, Inc., 9 FCC Rcd 7693 (1994). As to the legal issues, the Commission stated that COMSAT was prohibited by the Maritime Satellite Act from providing Inmarsat-P services through Inmarsat, but left open the possibility that COMSAT could provide Inmarsat-P services through an Affiliate that "did not in any way extend COMSAT's exclusive dealing arrangement with Inmarsat."^{2/} As to the policy issues, the Commission said that it would scrutinize those issues once an application to provide service in the United States was filed.^{3/}

4. COMSAT has recently applied to participate in the Inmarsat-P procurement.^{4/} This application proceeding will consider some of these legal and policy issues in detail.

^{2/} Id., 9 FCC Rcd at 7714.

^{3/} Id., 9 FCC Rcd at 7700.

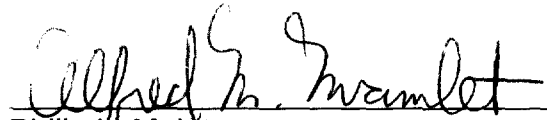
^{4/} File No. 106-SAT-MISC-95.

5. COMSAT has also recently applied to provide aeronautical and land mobile Inmarsat services in the United States.^{5/} This application proceeding may also consider some of these legal and policy issues.

Dated: June 8, 1995

Respectfully submitted,

**MOTOROLA SATELLITE
COMMUNICATIONS, INC.**



Philip L. Malet

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Its Attorneys

^{5/} See ITC-95-341.

CERTIFICATE OF SERVICE

I, Alfred M. Mamlet, hereby certify that the foregoing **MOTOROLA's Comments** was served, via first class mail (except where indicated), postage prepaid, this 8th day of June, 1995, on the following:

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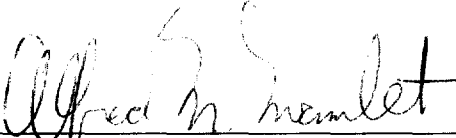
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